



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

file
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CERTIFIED MAIL: RETURN RECEIPT REQUESTED
Certified Mail Receipt No. 7003 0500 0003 0870 3970

April 28, 2006

John R. Eldridge
Haynes and Boone, LLP
1 Houston Center
1221 McKinney, Suite 2100
Houston, TX 77010

Re: Gulfco Marine Maintenance Superfund Site
Parker Drilling Offshore Company
Request to Substantiate Confidentiality Claim

Dear Mr. Eldridge:

This letter is to request that your client, Parker Drilling Offshore Corporation (hereinafter the Submitter), substantiate its claim of business confidentiality in regards to its response dated September 11, 2003, to the May 20, 2003, Request for Information pursuant to Section 104(e) of CERCLA to the U.S. Environmental Protection Agency (EPA).

Letter dated September 11, 2003 (Enclosed)
Re: Notice of Potential Liability and Request for Information Pursuant to Section 104(e) of CERCLA (42 U.S.C. § 9604(e))
Gulfco Marine Maintenance, Inc.; Freeport, Brazoria County, Texas
Response of Parker Drilling Offshore Company
All material responsive to the U.S. EPA Information Request

This letter notifies your client that the Office of Regional Counsel is currently determining, under 40 CFR Part 2, subpart B, whether or not the information is entitled to confidential treatment.

Prior to making that determination, EPA is affording you this opportunity to comment on the following issues:

1. The portions of the information, which are alleged by the Submitter to be entitled to confidential treatment.
2. The period of time for which confidential treatment is desired (e.g., until a certain date or until the occurrence of a certain event, etc.).



3. Measures taken by the Submitter to guard against undesired disclosure of the information to others.
4. The extent to which the information has been disclosed to others and the precautions taken in connection therewith.
5. Pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determination or reference to it.
6. Whether the Submitter asserts that disclosure of the information would be likely to result in substantial harmful effects on its competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects (including the manner in which the information is used in Submitter's business and the manner in which the competitor would use the information to Submitter's detriment).
7. Whether Submitter asserts that the information is voluntarily submitted information as defined at 40 CFR 2.201(i) and if so, why disclosure of the information would tend to lessen the availability to of similar information in the future.
8. Whether Submitter asserts that it submitted the information at all, i.e., whether or not the information is "submitted by a person" pursuant to 5 USC 552 (b) (4).
9. Whether the information, or part thereof, constitutes "emission data" pursuant to 40 CFR 2.301 or "effluent data" pursuant to 40 CFR 2.302.
10. Any other issue deemed relevant by the Submitter.

Please note that Submitter must bear the burden of substantiating its confidentiality claim pursuant to 40 CFR 2.208 (e). Conclusive allegations of fact will be given little or no weight in the determination. If relevant facts necessary to the substantiation are themselves confidential, please identify them as such so that EPA may maintain their confidentiality pursuant to 40 CFR 2.205 (c). If no claim is asserted, replies will be available to the public without further notice.

Submitter's comments must be transmitted (postmarked or delivered) to this office ***within 15 working days of receipt of this letter.*** Failure to comment within that time will be regarded as a waiver of the claim. You may apply for an extension of the comment period only in accordance with the provisions of 40 CFR 2.305 (b)(2).

If you have any questions in this matter, please contact me at (214) 665-2157.

Sincerely,

Barbara Nann

Barbara Nann
Assistant Regional Counsel

Enclosure